

UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

AFFIDAVIT

I, Jason Allen, being first duly sworn, hereby depose and state as follows:

I am a Special Agent (SA) of the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), and have been an agent with DHS since February 2006. I am currently assigned to the Office of the Resident Agent in Charge (RAC)/Greenville, South Carolina. As part of my official duties as an HSI Agent, I am assigned to investigate violations of US federal law, including narcotics violations.

The information contained in this affidavit is based upon an investigation that began in October 2020. The HSI Border Enforcement Security Task Force (BEST) Upstate SC, the United States Postal Inspection Service (USPIS) and the Greenville County Metropolitan Drug Enforcement Unit initiated an investigation into a drug trafficking organization (DTO) suspected of smuggling narcotics into the Greenville, South Carolina, area for distribution. During the course of this investigation, agents have identified United States Postal Service (USPS) mail parcels containing both cocaine and methamphetamine mailed from Arizona to multiple addresses in the Greenville area. Additionally, the facts related in this affidavit do not reflect the totality of the information known to me or other officers, deputies, and/or agents, merely the amount required to establish probable cause in support of the arrest warrant:

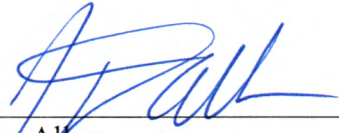
1. On February 9, 2022, pursuant to the on-going investigation, agents were conducting surveillance at the Windmill Apartments, located at 299 Miller Road, Mauldin, South Carolina. During the course of the investigation, agents had established that Ivan TAYLOR lived in apartment #76 within the Windmill Apartment complex. Agents observed a dark blue GMC Yukon, bearing a paper registration from Arizona, registered to a Jessica D. MIRANDA, arrive and park outside of the apartment building. At approximately 1:07pm, agents observed a female later identified as MIRANDA and a male minor child from the Yukon, PAZ, and Ivan TAYLOR enter the apartment building, where Darrecos TAYLOR was already located within. Later in the day, agents again observed Jesus Trinidad PAZ speaking with the occupants of the Yukon before PAZ, MIRANDA and the minor child, that was an occupant in the GMC Yukon, walk into the apartment building. MIRANDA and the minor child later left the apartment and traveled to a hotel located in Greenville, South Carolina.
2. Later that day, I obtained a Search Warrant, issued in the District of South Carolina, for the Windmill Apartment #76. During the subsequent search of the apartment, agents encountered Ivan TAYLOR, Darrecos TAYLOR and PAZ inside the apartment. Agents also discovered approximately three kilograms of a white powdery substance that field tested positive for cocaine inside the

apartment. One of the kilograms was open on the kitchen counter with PAZ's identification in the kilogram. The kilogram was clearly visible in the common area of the home. Agents also discovered items commonly used for the distribution of narcotics such as digital scales, a money counter and a brick press. GCSD Deputies arrested Ivan TAYLOR, Darrecos TAYLOR and PAZ pursuant to South Carolina state charges related to narcotics trafficking.

3. At approximately the same time agents were serving the Search Warrant at Windmill Apartment #76, agents observed MIRANDA and a minor female child exit the hotel room, enter the GMC Yukon and drive away from the hotel. Greenville County, South Carolina, Sheriff's Department (GCSD) Deputies performed a lawful stop of the vehicle. GCSD Deputies utilized a narcotics detection K-9 to perform a sweep of the outside of the vehicle. The K-9 positively alerted to the presence of narcotics within the vehicle. During the subsequent search of the vehicle, GCSD Deputies discovered approximately two-kilogram sized bricks of a substance that field tested positive for cocaine concealed within the engine compartment of the vehicle.
4. MIRANDA, was provided her rights under Miranda, waived those rights and agreed to answer questions from HSI agents. MIRANDA stated she was directed to deliver the cocaine by someone known as "Pecos". MIRANDA stated that she delivered four kilograms of cocaine to the apartments (she was unsure of the name of the apartments) and retrieved the two kilograms found inside the engine compartment and was directed to return them because "they were bad". MIRANDA stated that she was to be paid \$9,000 to smuggle the cocaine. MIRANDA stated that she delivered the cocaine to a Hispanic man and a black man.
5. MIRANDA stated that the minor female child, that was inside the GMC Yukon with her at the time of the vehicle stop, was her daughter. MIRANDA also stated that her son was located at the hotel. This was the same hotel that agents had observed her leaving from. Upon arriving at the hotel, agents encountered the same minor male child observed with MIRANDA at the Windmill Apartments. A South Carolina state Search Warrant was issued for the hotel room but no additional narcotics were discovered within the hotel room. MIRANDA was arrested by GCSD Deputies on South Carolina state charges related to narcotics trafficking. The minor children were turned over to the South Carolina Department of Social Services.
6. Agents queried law enforcement databases and discovered that the GMC Yukon had crossed the Mexico/United States International Border on February 1, 2022, at Douglas, Arizona. A photo that was taken as the vehicle crossed the border depicts MIRANDA and the two minor children inside the vehicle. Based on my training and experience, I know that Mexico is a source country for illegal narcotics including cocaine. Also, based on my training and experience, I further know that illegal narcotics are often smuggled across the US/Mexico border using

various smuggling techniques including concealing them within the engine compartment of a vehicle.

DATE: February 10, 2022.



Jason Allen
Special Agent
Homeland Security Investigations



Jacquelyn Austin
United States Magistrate Judge
District of South Carolina